

TARIFF ACTION MEMORANDUM

Date: April 15, 2021

File: TA36-998

Date TA Filed: March 9, 2021

Name of Utility: Alaska Universal Service Administrative Company (AUSAC)

Statutory End Date: April 23, 2021

Tariff Recommendations:

Staff recommends the Commission should approve Tariff Sheet No. 29, and the Monthly Carrier Remittance Worksheet Instructions, filed on March 9, 2021 by AUSAC with TA36-998, as shown in the attached side-by-side tariff sheets (see Attachment JPM-1) and worksheet instruction (see Attachment JPM-2). The effective date of the tariff sheet and worksheet instructions should be April 23, 2021.

Reasons for the above indicated recommendation:

See attached memorandum.

Signed: John Paul Manaois Title: Common Carrier Specialist
Jess Manaois

Commission decision re this recommendation:

	DATE (If different than 4/15/2021)	I CONCUR	I DO NOT CONCUR	I WILL WRITE A DISSENTING STATEMENT*
Pickett		<u>RMP</u>		
Kurber		<u>KKT</u>		
Scott		<u>AGS</u>		
Sullivan		<u>DS</u>		
Wilson		<u>JSW</u>		

Special Instructions to Staff: _____

*If this column is initialed, Staff will contact the Commissioner for the statement; otherwise, the dissent will simply be noted at the close of the By Direction Letter Order.

STATE OF ALASKA
The Regulatory Commission of Alaska
701 West 8th Ave., Suite 300
Anchorage, Alaska 99501-3469

M E M O R A N D U M

To: Robert M. Pickett, Chairman
Keith Kurber II
Antony G. Scott
Daniel A. Sullivan
Janis W. Wilson

Date: April 15, 2021

File: TA36-998

JM

From: Jess Manaois, Common Carrier Specialist

Subject: Alaska Universal Service Administrative Company (AUSAC) General Revisions to Tariff Sheet and Remittance Worksheet Instructions.

RECOMMENDATIONS

The Commission should approve Tariff Sheet No. 29, and the Monthly Carrier Remittance Worksheet Instructions, filed on March 9, 2021 by AUSAC with TA36-998. The effective date of the tariff sheet and worksheet instructions should be April 23, 2021.

PROCEDURAL HISTORY

On March 9, 2021, AUSAC¹ filed tariff revisions designated as TA36-998. The filing proposes to update the Monthly Carrier Remittance Worksheet Instructions and the tariff sheet that memorializes the worksheet revisions.² Specifically, AUSAC proposes to align the time period for revisions to revenue filings for carriers subject to the AUSF remittance requirements with the six-month shortage claims provisions in 3 AAC 53.350(e)(9). In response to Staff questions, AUSAC filed supplemental information on April 8, 2021.³ The Chairman waived the requirement to issue a public notice for TA36-998.⁴

DISCUSSION

The AUSF was established by regulation in 1999 (3 AAC 53.300 - 3 AAC 53.399).⁵ The programs

¹The Alaska Universal Service Fund (AUSF) was established by regulation in 1999, and has been in operation since March 1, 1999. The Commission created AUSAC to function as administrator of the AUSF.

²*Tariff Advice Letter 36-998, AUSF Monthly Carrier Remittance Worksheet Instructions Update*, filed March 9, 2021 (TA36-998).

³See email from K. Bernier to staff, dated April 8, 2021 (Response to Staff).

⁴See Staff email dated March 15, 2021.

⁵See Orders R-97-005(7)/R-97-006(7)/U-98-168(1), *Order Adopting Regulations and Changes to Manual; Opening Docket to Consider AUSF Administrator; and Establishing Meeting and Filing Requirements* (November 23, 1998); and R-97-005(8)/R-97-006(8)/U-98-168(2), *Order Adopting Regulations and Manual*

supported by the AUSF at that time included Dial Equipment Minute (DEM) weighting, State Lifeline (SLS), Public Interest Pay Telephones (PIPT), Local Exchange Carrier of Last Resort (COLR) and Carrier Common Line (CCL). The AUSF is funded by a surcharge on public utilities and other voice carriers that provide intrastate telecommunications service. These entities must pay the surcharge on their annual intrastate gross revenues from end users, for the services listed in 3 AAC 53.340(a) (i.e. local, long distance, cellular, Voice over Internet Protocol (VoIP), etc.).⁶ The AUSF surcharge may be passed through and collected from a company's end users.⁷ AUSAC is a member-based non-profit association that has been designated by the Commission to administer the AUSF.⁸ In accordance with 3 AAC 53.340(d), AUSAC is required to calculate and recommend an AUSF surcharge factor by October 1 of each year for the following calendar year.

In 2017, the Commission revised the regulation on AUSF that includes provision on how universal service support payments would be disbursed when there is a shortage in the AUSF for a particular month.⁹ Further, the Commission added a provision allowing eligible but unpaid universal service support to be deferred for a period up to six months.¹⁰ After six months deferral, those claims are considered stale and are retired.¹¹

Although the language in AUSAC's tariff is already consistent with 3 AAC 53.350(e)(9),¹² the worksheet instructions had not yet been updated. TA36-998 seeks to correct this oversight.

Monthly Carrier Remittance Worksheet Instructions

AUSAC proposes to revise the remittance worksheet to comply with the payment limitations established in 3 AAC 53.350(e)(9), in that AUSAC may not pay any claim that remains unpaid

Amendments: Addressing Implementation Issues; and Requiring Filings, dated December 30, 1998.

⁶See 3 AAC 53.340(a). A public utility that provides intrastate telecommunications service to the public, or to those classes of users as to be effectively available to the public for a fee, shall pay the surcharge to the AUSF.

⁷See Orders R-97-005(8)/R-97-006(8)/U-98-168(2) at 13.

⁸See Order U-98-168(8), *Order Designating AUSAC as Administrator of the AUSF, Amending and Approving Audit Plan, Specifying Changes in AUSAC's Quarterly Disbursement Report, Requiring Public Report Section to be Added to Website, and Closing Docket*, dated May 20, 2004.

⁹See Order R-17-001(3), *Order Adopting Regulations*, dated December 5, 2017.

¹⁰[3 AAC 53.350](#)(e), which currently states in pertinent part:

The administrator shall disburse the AUSF in the following order of priority:

- (1) administrative costs;
- (8) other universal service support programs listed in (a) of this section, oldest claims first, pro-rated among claimants within a monthly accounting period based on the total unpaid claims for that period;
- (9) valid claims for universal service support accrued before March 17, 2018; except for those claims, the administrator may not pay any claim that remains unpaid more than six months after accrual.

¹¹ 3 AAC 53.350(e)(9).

¹²AUSAC Tariff Sheet No. 25.1

more than six months after accrual. AUSAC seeks to update the current 24 month remittance worksheet revision period to a six-month revision period.¹³

If the proposal is approved, AUSAC states that a remitting carrier can submit overpayment or underpayment revisions to the AUSF within the most recent six-month window.¹⁴ Further, AUSAC clarifies that it treats the remittance submission process and the support disbursement process separately. AUSAC states that revisions to reported revenues and the resulting credit or amount due would be resolved through the remittance submission process. The compliance review – AUSAC’s audit procedure – is separate from the revision timeframe. An independent audit firm conducts the compliance review by selecting up to five companies to review annually. The compliance review process begins after the current twenty-four-month revision timeframe.¹⁵ The purpose for the compliance review is to ensure that companies are reporting properly and to identify any mistakes.¹⁶

Staff notes that the operation of the 10% surcharge cap has placed the AUSF, for practical purposes, in a perpetual shortage situation such that fund no longer carries any effective balance.¹⁷ AUSAC stated that the surcharge cap has depleted the Fund’s working cash allowance,¹⁸ and Staff notes that revisions longer than the six-month deferral period would impact the distribution of AUSF support payments to the possible detriment of support recipients because 3 AAC 53.350(e)(9) prohibits AUSAC from paying claims that have been deferred for longer than 6 months. Staff believes that this filing is timely because the six-month stale claims provisions will begin to retire deferred claims on the AUSF as soon as this month.¹⁹

Although AUSAC proposes revision to only page 3 of the worksheet instructions, AUSAC submitted the Monthly Carrier Remittance Worksheet Instructions in its entirety for approval. AUSAC Tariff Sheet No. 29 lists the effective date of each form utilized by AUSAC, including the worksheet instructions. Any revisions proposed to a form, AUSAC files the entire form for approval.

Staff has reviewed the Monthly Carrier Remittance Worksheet Instructions and believes that that proposed changes reflect the provision in the regulation. Therefore, Staff recommends the Commission approve the revised Monthly Carrier Remittance Worksheet Instructions.

Tariff Sheet No. 29

Tariff Sheet No. 29 is an index of the appendix. The appendix contains samples of current forms and the corresponding instructions approved by the Commission for the administration of the AUSF. The forms and instructions are not numbered as tariff sheets. Therefore, the appendix lists the name of each form, the effective date, and the number of pages included. Accordingly, Staff recommends approval of Tariff Sheet No. 29.

¹³TA36-998 at 1.

¹⁴Response to Staff at 2–3.

¹⁵Staff assumes the compliance review lag will not be revised even though the revision period will be dramatically shortened.

¹⁶Response to Staff at 3.

¹⁷See *also* Response to Staff at 2.

¹⁸Response to Staff at 2.

¹⁹ See generally [Minutes of the March 25, 2021, AUSAC Board Public Meeting](#).

Staff has reviewed the revisions proposed with TA36-998, and concludes substantive changes comport with the regulations, and should be approved.

CONCLUSION

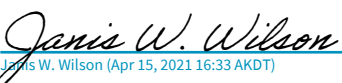
The Commission should approve Tariff Sheet No. 29, and the Monthly Carrier Remittance Worksheet Instructions, filed on March 9, 2021 by AUSAC with TA36-998. The effective date of the tariff sheet and worksheet instructions should be April 23, 2021.

Signature: 
Email: bob.pickett@alaska.gov

Signature: 
Keith Kurber II (Apr 15, 2021 09:29 AKDT)
Email: keith.kurber@alaska.gov

Signature: 
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Signature: 
Daniel Sullivan (Apr 15, 2021 10:33 AKDT)
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Signature: 
Janis W. Wilson (Apr 15, 2021 16:33 AKDT)
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Attachment JPM-1

RCA No. 998 Sixteenth Revised Sheet No. 29

Cancelling Fifteenth Revised Sheet No. 29

ALASKA UNIVERSAL SERVICE ADMINISTRATIVE COMPANY

RECEIVED
MAY 12 2020

STATE OF ALASKA
REGULATORY COMMISSION OF ALASKA

APPENDIX I

This Appendix contains samples of current Forms and Reports for the administration of the AUSF that have been approved by the Commission. The Forms and Reports are not numbered as tariff sheets. Forms and Reports included in Appendix I are:

<u>Name of Form</u>	<u>Effective Date</u>	<u>No. of Pages</u>	
Monthly Carrier Remittance Worksheet	January 1, 2019	1	
Monthly Carrier Remittance Worksheet Instructions	April 23, 2020	11	(T)

Tariff Advice No. 33-998 _____ Effective: May 26, 2020

Date Issued:
Issued By: ALASKA UNIVERSAL SERVICE ADMINISTRATIVE COMPANY

By: _____ Title: President
Andilea Weaver

RCA No. 998 Seventeenth Revised Sheet No. 29

Cancelling Sixteenth Revised Sheet No. 29

ALASKA UNIVERSAL SERVICE ADMINISTRATIVE COMPANY



APPENDIX I

This Appendix contains samples of current Forms and Reports for the administration of the AUSF that have been approved by the Commission. The Forms and Reports are not numbered as tariff sheets. Forms and Reports included in Appendix I are:

<u>Name of Form</u>	<u>Effective Date</u>	<u>No. of Pages</u>	
Monthly Carrier Remittance Worksheet	January 1, 2019	1	
Monthly Carrier Remittance Worksheet Instructions	April 23, 2021	11	(T)

Tariff Advice No. 36-998 _____ Effective: April 23, 2021

Date Issued:
Issued By: ALASKA UNIVERSAL SERVICE ADMINISTRATIVE COMPANY

By: _____ Title: President
Andilea Weaver

ALASKA UNIVERSAL SERVICE FUND

Monthly Carrier Remittance Worksheet Instructions

I. Filing Requirements and General Instruction

A. Introduction

On December 30, 1998, the Regulatory Commission of Alaska (RCA) (formerly known as the Alaska Public Utilities Commission or APUC) issued Order R-97-6(8) to create the Alaska Universal Service Fund (AUSF) and designating the Alaska Universal Service Administrative Company (AUSAC) to administer the collection and distribution of the monies for the Alaska Universal Service Fund (AUSF). The Alaska Universal Service Fund (AUSF) is established to promote the efficiency, availability and affordability of universal telephone service in Alaska. These instructions explain how to complete the Monthly Carrier Remittance Worksheet, which is used to calculate and provide underlying support for monthly payments by intrastate telecommunications carriers to the Alaska Universal Service Fund (AUSF). The monthly payments due are computed as a specified percentage of revenues billed to end-users.

B. Who Must File

With certain exceptions, the AUSF is to be funded by all intrastate telecommunications carriers that operate or provide telecommunications services within the State of Alaska. An intrastate telecommunications transmission is one that originates and terminates in Alaska, irrespective of actual routing.

C. When and Where to File

Monthly Carrier Remittance Worksheets and remittances must be received by AUSAC on or before the 20th calendar day of each month. Payment shall be delinquent on the 21st calendar day.

Monthly Carrier Remittance Worksheet Instructions

Payments due of sums greater than \$500.00 shall be made by wire transfer or Electronic Fund Transfer (EFT) directly to AUSAC's AUSF bank account on or before the 20th calendar day from the date the bill was rendered. If this due date is a local bank holiday, funds shall be wire transferred or EFT on the prior workday. Payments of \$500.00 or less may be paid via check mailed in time to arrive at AUSAC's office no later than the 20th calendar day from the date the bill was rendered.

Send completed worksheet and payment to:	Alaska Universal Service Administrative Company 810 N Street, Suite 204 Anchorage, Alaska 99501 Fax (907) 561-6303 Email info@ausac.org
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D. Interest and Damages on Late Payments

If payment is not received in immediately available funds by the due date, interest at the rate of .000287 per day, calculated on the total amount due, will be charged until the date paid. In addition to interest, if payment is not received in immediately available funds within two (2) working days of the due date, a one-time liquidated damages sum equal to one percent (1%) of the total amount due will be charged.

II. Line-by-Line Instructions for Completion of the Monthly Carrier Remittance Worksheet

All information provided must be legible and printed in black ink, typed, or electronically reproduced.

Monthly Carrier Remittance Worksheet Instructions

Filing Identification Information

The following blocks are located in the top margin of the Monthly Carrier Remittance Worksheet. Fill in the information as follows:

Block A - Company Code

The company code, supplied by AUSAC, starts with AK followed by four digits. For existing companies, this code is located in the top right corner of the packet cover letter. If this is the first filing for this company, and you have not been assigned a code, indicate NEW in this block.

Block B - Submission Date

The Submission Date is the date the Monthly Carrier Remittance Worksheet is being forwarded to AUSAC. AUSAC should receive the worksheet by the 20th day of each month.

Block C - Revenue Data Month and Year

The Revenue Data Month and Year indicates the month and year that corresponds to the revenue data being reported.

Block D - Original or Revision

Carriers should indicate if this is the initial (original) submission of a revenue data month or if the Monthly Carrier Remittance Worksheet contains a revenue data month revision. Revisions should be indicated only when filing a correction or adjustment to a previously filed data month.

Filing Revisions

Revisions may be used for correction of revenues previously reported. Revision period is the most recent 6 months. When filing a revision, follow these same instructions, making certain that the correct Revenue Data Month has been entered in Block C and revision is indicated in Block D. Attach a copy of the original filing for the Revenue Data Month being revised. Provide actual revised revenue amounts, not differences.

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Monthly Carrier Remittance Worksheet Instructions

Section 1: Carrier Identification

Line 1 - Company Name

Enter the carrier name that identifies the filing entity and/or any doing business as (d/b/a) names if applicable.

Line 1a - Mailing Address

Enter the complete mailing address of the corporate headquarters of the carrier including street address, city, state, zip, suite numbers, floor, etc.

Line 1b - Telephone

Enter telephone number for the company headquarters.

Line 1c – Email Address

Enter email address for the company headquarters.

Monthly Carrier Remittance Worksheet Instructions

Section 2 - Monthly Intrastate End User Revenue Data

Enter numbers to the nearest whole dollar; for example, enter \$1,258.67 as \$1,259; enter \$1,258.34 as \$1,258.

Revenues entered here should be for the revenue data month indicated in Block C of this form. These revenues should correspond to the official accounting records of the company except if using estimated numbers to be reconciled to actuals at the end of the filing company's accounting period.

End-User Revenues: General Instructions

As a general rule, the AUSF surcharge is charged to a company as a percentage of end-user revenues billed for intrastate telecommunications services. Intrastate telecommunications carriers may recover the surcharge from end-users through a line item charge on their bills, identified as "Alaska Universal Service Fund Surcharge."

End-user revenues are revenues billed to end-users. An end-user is any customer of an intrastate telecommunications service who is not a telecommunications carrier, (hereinafter referred to as a "carrier") except that a carrier shall be deemed to be an "end-user" to the extent that such carrier uses a telecommunication service for administrative purposes, without making such services available to others, directly or indirectly. Telecommunications carriers offer telecommunications services for a fee directly to the public or to such classes of users as to be effectively available to the public. Telecommunications carriers subject to the AUSF surcharge are those carriers offering one or more of the following services:

Monthly Carrier Remittance Worksheet Instructions

Section 2 - Monthly Intrastate End User Revenue Data (Continued)

1. Cellular telephone and paging services;
2. Mobile radio services;
3. Operator services;
4. Personal communications services (PCS);
5. Local exchange service;
6. Special access service;
7. WATS;
8. Toll-free service;
9. 900 service;
10. Message telephone service (MTS);
11. Private line service;
12. Telex;
13. Telegraph;
14. Video services;
15. Satellite service;
16. Resale of intrastate services; and
17. Pay phone services.
18. Network Access Fee
19. Interconnected Voice over Internet Protocol (VoIP)

In order to ensure that the surcharge is charged equitably and fairly on end-user revenues once but not twice, when a carrier receives revenues from sale of telecommunications service to another carrier, most generally as a wholesale transaction, the selling carrier's revenues are exempt from the AUSF surcharge. In such cases the purchasing carrier is charged the AUSF surcharge when it converts the purchased service into a service sold to the public or to an end-user. However, if the carrier purchasing the service uses the service for its own administrative purposes, then that revenue is considered an end-user revenue and is treated for surcharge purposes like any other end user revenue. For example, if a long distance company purchases from another long distance company, whether retail or wholesale, to the extent that it resells the service to end-users, the purchasing company is responsible for paying the AUSF surcharge. To the extent that the purchasing company uses the service for its own administrative purposes, and does not resell it, then the company selling the service should pay the AUSF surcharge. Specific examples and illustrations are given later in these instructions.

Monthly Carrier Remittance Worksheet Instructions

Section 2 - Monthly Intrastate End User Revenue Data (Continued)

Exemptions

There are several categories of exemptions from the AUSF surcharge. They are described below with illustrative examples. The examples are meant as illustrations and do not necessarily limit the possible exemptions.

1. Wholesale transactions between carriers, including access charges, interconnection charges, and billing and collection charges are exempt from the AUSF surcharge because they are not end-user revenues. The exception is when the purchasing company uses the service for its own administrative means. For example, carriers purchasing interexchange service from a facilities based carrier's wholesale tariff are normally exempt from the AUSF surcharge. In addition, if a reselling company purchases from the retail tariff of an interexchange carrier with the intent of reselling the service, the AUSF surcharge is not charged to the selling carrier. As another example, if an interexchange carrier purchases an intrastate special access or private line link from a local exchange carrier and repackages it to an end-user, the interexchange carrier who receives the end-user revenues directly should pay the AUSF surcharge.
2. All interstate revenues and international revenues are exempt from the AUSF surcharge by definition. If carriers are not able to directly segregate intrastate revenues from interstate and international revenues, they may use accepted, rational and systematic methods to allocate such revenues. Such allocation methods are subject to verification and audit.
3. Services offered by telecommunications carriers but which are not considered telecommunications services are also exempt from the AUSF surcharge. Examples of such services are sales and rentals of telephone equipment, inside wire and maintenance services sold to customers, and yellow pages ("directory") advertising. Also exempt are other surcharges imposed by the RCA; for example the regulatory cost surcharge, E911 surcharges, and the TRS surcharge. Late payment fees are also exempted.
4. Also exempted are state, local and federal taxes, federal USF payments, and support payments from the AUSF. These are not end-user revenues.
5. Other exemptions include cable TV services, open video systems, cable leased access, and direct broadcast satellite services. These are exempted by the RCA's order establishing the AUSF. Refer to RCA Tariff 998, Part II.C. for Exemptions from Payment of Surcharge.

Effective: April 23, 2021

Monthly Carrier Remittance Worksheet Instructions

Section 2 - Monthly Intrastate End User Revenue Data (Continued)

In summary, a company purchasing a service for resale to an end-user will assess the AUSF assessment on revenues collected from its end-users. The wholesale company will not include service that it sells to resellers in its retail revenues. Services purchased for internal use and not resold to end-users will be considered end user revenues to the wholesale company, which should calculate and make AUSF payments on such revenues. They will not be included in the reseller's retail revenues.

Line 2 - Local Service Revenues

Includes basic monthly charges, customer charges, installation fees, service order charges, vertical features, extended area service charges, location charges for mileage bands, and all other local exchange service revenues, such as would be found in the Company's tariff. (Do not include the federal subscriber line charge.) Also includes revenues from providing local services that involve dedicated circuits, private switching arrangements and/or predefined transmission paths.

Line 3 - Wireless/PCS/Mobile/Paging Revenues

Includes intrastate charges such as basic wireless monthly charges, usage charges, activation fees, service restoration, service order processing charges, end user prepaid wireless charges, administration fees, and all other wireless telecommunications revenues. Also includes airtime charges and roaming usage in Alaska. Airtime should include revenues billed to wireless customers for actual airtime usage.

Line 4 - Interexchange Switched Toll and Private Line Revenues

Includes intrastate toll message revenues including operator services, cellular intrastate long distance revenues and intrastate 800 revenues. For purposes of determining intrastate 800 revenues, carriers may use the Percent Interstate Usage (PIU) factor used for reporting interstate access minutes to allocate revenues between interstate and intrastate. Also includes revenues from providing dedicated circuits, private switching arrangements and/or predefined transmission paths that extend beyond the basic service area.

Line 5 - Pay Telephone Revenues

Includes intrastate revenues derived from public and semi-public telephone services.

Monthly Carrier Remittance Worksheet Instructions

Section 2 - Monthly Intrastate End User Revenue Data (Continued)

Line 6 - VoIP Revenues

Includes interconnected Voice over Internet Protocol (VoIP) intrastate end user revenues.

Line 7 - Other Revenues

Includes miscellaneous intrastate end user revenues that would not reasonably be included with one of the other service categories.

Line 7 a. Less Uncollectible Revenue

Intrastate uncollectible Revenue is required to be listed here.

Line 8 - Total Intrastate End-User Revenues

Total the figures for Line 2 through Line 7 a. and enter this amount on Line 8. This represents the total monthly intrastate retail revenues.

Section 3 - Remittance Calculation

Line 9 - AUSF Rate

The current AUSF effective date and percentage rate appears on this line.

Line 10 - AUSF Amount Due

Multiply the amount on Line 8 by Line 9 as indicated on the worksheet and enter the result on Line 10.

Section 4 - Change in Company Status

Line 11 - Date

If there is a carrier name change, enter the effective date.

Line 12 - Business Status Change

If business status has changed in Alaska, enter the date that the business was sold, merged, or discontinued.

Monthly Carrier Remittance Worksheet Instructions

Line 12 a. - Survivor Company Name

If business has been sold or merged, provide the survivor company name. If the business has recently started in Alaska, enter the date the business began.

Section 5 - Certification

Line 13 - Signature Information

Enter date, name, signature, and title of the person signing the report. The signature attests to the accuracy of all information on this remittance worksheet.

Line 14 - Contact Information

Provide name, title, and telephone number of a person to contact if there are questions regarding this report. If contact person is same as authorized signature, indicate "same as line 14." Mailings will be sent to the contact person address unless other arrangements are made with AUSAC.

Line 15 - Signer's Mailing Address

Enter the complete mailing address of the person signing the report.

Line 16 - Signer's Email Address

Enter the complete Email address of the person signing the report.

Monthly Carrier Remittance Worksheet Instructions

Worksheet Submission and Payment Method

For payments by check mail completed forms and checks to AUSAC at address indicated. For electronic transfer payments, you may send the Monthly Carrier Remittance Worksheet to AUSAC via fax or e-mail.

In the bottom right margin, please check applicable payment method.

Worksheet Record and Retention Period

Contributors to the AUSF shall maintain records and documentation to justify information reported in the Monthly Carrier Remittance Worksheet Instructions including the methodology used to determine projections, for five years and shall provide such records and documentation to the Commission or AUSAC upon request.